

# Exhibit 1

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 - WILL GRANNIS -</p> <p>2 product success role, was that an Eng role?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. The role that I was hired into was</p> <p>5 a -- I believe it was program management was</p> <p>6 the -- was the function.</p> <p>7 Q. Did it have an engineering component?</p> <p>8 A. Yes.</p> <p>9 Q. And what was that component?</p> <p>10 A. I was expected to be the subject</p> <p>11 matter expert on all Cloud technologies ranging</p> <p>12 from artificial intelligence, streaming analytics,</p> <p>13 computation, storage, networking, and to provide</p> <p>14 recommendations to the business on where we should</p> <p>15 invest our go-to market resources based on the</p> <p>16 strength -- relative strengths or weaknesses of</p> <p>17 our products.</p> <p>18 Q. Did it have a product management</p> <p>19 component?</p> <p>20 A. I -- no.</p> <p>21 Q. When you came into that role, what</p> <p>22 was your title?</p> <p>23 A. Director, and I don't -- I don't know</p> <p>24 if it was customer success, product success.</p> <p>25 It's -- I don't recall the exact title at the</p>	<p style="text-align: right;">Page 24</p> <p>1 - WILL GRANNIS -</p> <p>2 firsthand -- real firsthand experience whether it</p> <p>3 was hands-on or leadership that we would make -- I</p> <p>4 was offered to start this role up and at the time</p> <p>5 it was scoped to be a very small thing and an</p> <p>6 experimental function.</p> <p>7 Q. What was the title or descriptive</p> <p>8 title of that role?</p> <p>9 A. Director, office of the CTO.</p> <p>10 Q. Did that role include an engineering</p> <p>11 component?</p> <p>12 A. Yes, the -- eventually. So part of</p> <p>13 creating a team was -- actually was also creating</p> <p>14 the -- the features of the -- the function itself.</p> <p>15 It was a new function at Google.</p> <p>16 Q. And did that function gain a name?</p> <p>17 A. Yes.</p> <p>18 Q. And what was the name?</p> <p>19 A. The Office of the CTO was the name of</p> <p>20 the group and the function, we decided to utilize</p> <p>21 a technical job family that had been used</p> <p>22 elsewhere in Google and put it in engineering for</p> <p>23 the first time.</p> <p>24 Q. What do you mean, "put it in</p> <p>25 engineering"?</p>
<p style="text-align: right;">Page 23</p> <p>1 - WILL GRANNIS -</p> <p>2 time.</p> <p>3 Q. Do you recall what your level was?</p> <p>4 A. L 8.</p> <p>5 Q. Do you recall what job ladder that</p> <p>6 was in?</p> <p>7 A. Program management.</p> <p>8 Q. When was your start date?</p> <p>9 A. It was the end of March, '2015</p> <p>10 approximately.</p> <p>11 Q. And how long were you in that role?</p> <p>12 A. It was roughly a year.</p> <p>13 Q. And where did you go next?</p> <p>14 A. My next role was starting the office</p> <p>15 of the CTO.</p> <p>16 Q. And how did it come to be that you</p> <p>17 made a move into the office of the CTO?</p> <p>18 A. I was asked to formulate -- because</p> <p>19 of my background in enterprise technology both in</p> <p>20 startups and in large enterprises, I was asked to</p> <p>21 provide thoughts and opinions to leadership around</p> <p>22 building such a function.</p> <p>23 And at the time I was told based on</p> <p>24 high performance in the role, demonstrated</p> <p>25 knowledge of the products and, you know,</p>	<p style="text-align: right;">Page 25</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Our job families can exist. So the</p> <p>3 job family that was used for the office of the CTO</p> <p>4 had certain elements that we wanted to bring</p> <p>5 across and we knew that engineering, the core of</p> <p>6 the team would be critical to have engineering</p> <p>7 skills.</p> <p>8 And so we took the features of a job</p> <p>9 that allowed for a blend of customer facing,</p> <p>10 customer impact-type work, plus engineering-type</p> <p>11 work and we put it in engineering, meaning it was</p> <p>12 in the engineering hierarchy which allow the</p> <p>13 members of the team to participate in the larger</p> <p>14 engineering organization whether that was, you in,</p> <p>15 you know, developing or in more engineering-like</p> <p>16 reviews.</p> <p>17 Q. Was -- the technical job family</p> <p>18 you -- you talked about, was that technical</p> <p>19 solutions consultant?</p> <p>20 A. Yes.</p> <p>21 Q. And so there were technical solutions</p> <p>22 consultants outside of OCTO at the time you</p> <p>23 adopted that title?</p> <p>24 A. We don't -- we don't refer to</p> <p>25 technical solutions consultant and the job family</p>

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<p style="text-align: right;">Page 26</p> <p>1 - WILL GRANNIS -</p> <p>2 as the title. The title is what we use like</p> <p>3 Director, Office of the CTO, but as a job family,</p> <p>4 that is -- that is what we adopted.</p> <p>5 Q. So the technical solutions consultant</p> <p>6 job family as it existed in OCTO was different</p> <p>7 than as it existed elsewhere in Google Cloud; is</p> <p>8 that right?</p> <p>9 A. Yes, there -- there was a heavier</p> <p>10 emphasis on engineering.</p> <p>11 Q. Did the function include a product</p> <p>12 management component?</p> <p>13 A. No.</p> <p>14 Q. At some point, did your job level</p> <p>15 change?</p> <p>16 A. Yes.</p> <p>17 Q. When was that?</p> <p>18 A. I don't recall exactly, but it was</p> <p>19 roughly I think between two and three years of my</p> <p>20 time in Google.</p> <p>21 Q. Was it in connection with a</p> <p>22 promotion?</p> <p>23 A. Yes.</p> <p>24 Q. Did your job role change at the time</p> <p>25 of the promotion?</p>	<p style="text-align: right;">Page 28</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Yes, I hold that role and then my</p> <p>3 role is also combined with Brian's role.</p> <p>4 Q. And what was Brian's title --</p> <p>5 A. He was --</p> <p>6 Q. -- at the time you reported to him?</p> <p>7 A. He held two titles throughout our</p> <p>8 time; first he was head of product management when</p> <p>9 I had first reported to him and then he became the</p> <p>10 CTO while I was reporting to him.</p> <p>11 Q. And so presently what is the</p> <p>12 descriptive title that you use for your position?</p> <p>13 A. Managing Director, Office of the CTO.</p> <p>14 Q. Did you choose that title?</p> <p>15 A. I'm just thinking back to the -- the</p> <p>16 origin of how the title came up.</p> <p>17 Q. Sure.</p> <p>18 A. So managing director is a</p> <p>19 convention -- a pretty standard convention used</p> <p>20 for L 9 on the TSC -- in the TSC job family. So I</p> <p>21 don't -- I don't recall actually it being a</p> <p>22 conscious conversation between, you know, anyone.</p> <p>23 It was more of a -- with the promotion, the -- the</p> <p>24 job title came. It also reflects the nature of my</p> <p>25 role, which is the managing director of the -- the</p>
<p style="text-align: right;">Page 27</p> <p>1 - WILL GRANNIS -</p> <p>2 A. No.</p> <p>3 Q. When you -- going back to the job</p> <p>4 family piece of this, you said it allowed for</p> <p>5 participation in the engineering hierarchy. Did</p> <p>6 that include being considered part of Eng for</p> <p>7 purposes of -- of Eng conferences that Google</p> <p>8 would put together?</p> <p>9 A. Yes.</p> <p>10 Q. And participation on things like the</p> <p>11 Eng Listserv?</p> <p>12 A. Yes.</p> <p>13 Q. Who did you report to in that role?</p> <p>14 MR. GAGE: Objection.</p> <p>15 Q. In the role that you held within</p> <p>16 OCTO, who did you report to?</p> <p>17 A. I reported to Brian Stevens.</p> <p>18 Q. Are you still in that role in OCTO?</p> <p>19 A. Is -- is your question do I still</p> <p>20 report to Brian Stevens?</p> <p>21 Q. No. I'm -- I'm aware I think that</p> <p>22 Mr. Stevens has left.</p> <p>23 My question is: The job role that</p> <p>24 you held, have you continued to hold that role up</p> <p>25 till today?</p>	<p style="text-align: right;">Page 29</p> <p>1 - WILL GRANNIS -</p> <p>2 organization.</p> <p>3 Q. Okay. Are you in the -- are you in</p> <p>4 the TSC job ladder?</p> <p>5 A. I am.</p> <p>6 Q. At the time you took on the position,</p> <p>7 was there a job ladder that applied?</p> <p>8 A. When I took the position of, which</p> <p>9 position? The original --</p> <p>10 Q. When you were in OCTO, the time you</p> <p>11 took the position in OCTO had the TSC job ladders</p> <p>12 for OCTO been developed?</p> <p>13 A. No.</p> <p>14 Q. So you've had the opportunity to work</p> <p>15 with Ms. Rowe while she's been at Google, correct?</p> <p>16 A. Yes.</p> <p>17 Q. In what capacity?</p> <p>18 A. Hiring manage --</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. Hiring manager, direct manager twice.</p> <p>21 Q. And as her direct manager, what has</p> <p>22 been the frequency of your interactions with her?</p> <p>23 A. As her direct manager we've had</p> <p>24 standing one-to-ones since she started at -- at</p> <p>25 Google, and then in the period of time when she</p>

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<p style="text-align: right;">Page 30</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 did not report to me I was also someone that she</p> <p>2 would come to for advice.</p> <p>3</p> <p>4 Q. And how frequently as the direct</p> <p>5 manager did you have one-to-ones with her?</p> <p>6 A. The -- the normal schedule was every</p> <p>7 two weeks unless it was interrupted by some type</p> <p>8 of vacation, time off, other circumstances; but</p> <p>9 it's all of my direct reports and I, we have a</p> <p>10 one-to-one on a standing schedule.</p> <p>11 At -- at the beginning it was every</p> <p>12 week, then it went to every two weeks and then</p> <p>13 over time I found that many of my direct reports</p> <p>14 choose to go once a month, but generally speaking</p> <p>15 it was very frequent.</p> <p>16 Q. And were there times that you</p> <p>17 interacted outside of your normally scheduled</p> <p>18 one-to-ones?</p> <p>19 A. Yes.</p> <p>20 Q. And what would be the types of</p> <p>21 circumstances where you would interact outside of</p> <p>22 one-to-ones?</p> <p>23 A. As I recall, most of those</p> <p>24 interactions were initiated by Ulku asking me a</p> <p>25 question on a specific circumstance.</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 detail, so it will probably help. OCTO, the job</p> <p>2 family as seen in the job description and in OCTO</p> <p>3 as we've described since the very beginning of the</p> <p>4 CTO office, the role consists of three main we'll</p> <p>5 call them buckets of work. There's customer work,</p> <p>6 there's influencing the platform and products, and</p> <p>7 then there is the speaking, the evangelism part.</p> <p>8 In order to create impact with the</p> <p>9 customer OCTOs are expected to help materially</p> <p>10 advance the progress of the largest brands in the</p> <p>11 world; and what I mean by that is, you know, come</p> <p>12 to Cloud, come to Google Cloud and succeed with</p> <p>13 Google Cloud.</p> <p>14 The second pillar, the engineering</p> <p>15 pillars, are expected to take their knowledge from</p> <p>16 the corporate world and what they obtain at Google</p> <p>17 and they're expected to show impact on the product</p> <p>18 road map, and this can come in a variety of</p> <p>19 fashions. Most often this means that they have</p> <p>20 championed a change that we need make to what</p> <p>21 we're building that it is accepted by the</p> <p>22 engineering, production, leadership.</p> <p>23 And the third pillar is conveying the</p> <p>24 power of our technology to the outside world</p> <p>25</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And in your interactions with her,</p> <p>2 have you found her to be professional?</p> <p>3</p> <p>4 A. Yes.</p> <p>5 Q. Have you found her to be</p> <p>6 knowledgeable with respect to her subject area?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. As documented in performance reviews,</p> <p>9 there are three categories. You know, when you</p> <p>10 say "knowledgeable," that requires a view across</p> <p>11 the three categories of the role. There's a</p> <p>12 customer element of the role, there's an</p> <p>13 engineering element of the role, and there's an</p> <p>14 evangelism element of the role.</p> <p>15 Ulku has demonstrated as -- you know,</p> <p>16 as shown in her performance reviews she's</p> <p>17 demonstrated acumen and knowledge; significant</p> <p>18 knowledge in evangelism, knowledge of financial</p> <p>19 services and customers, but impact knowledge on</p> <p>20 the engineering pillar has been less than the</p> <p>21 average in OCTO.</p> <p>22 Q. And tell me what that means, "impact</p> <p>23 knowledge."</p> <p>24 A. What that means is the sec -- the --</p> <p>25 if I may describe the three in a little more</p>	<p style="text-align: right;">Page 33</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 and helping create a translation between our</p> <p>2 technology and its possibilities in the context of</p> <p>3 the day; and in this way Ulku for example spent</p> <p>4 most of her time explaining the power of</p> <p>5 technology to financial services organizations and</p> <p>6 regulators, organizations like that externally.</p> <p>7 Q. So we'll come back to some of this.</p> <p>8 With respect to the second bucket,</p> <p>9 influencing the platform products and the</p> <p>10 engineering piece -- do I have that right, that's</p> <p>11 the second bucket?</p> <p>12</p> <p>13 A. Yes.</p> <p>14 Q. Describe for me a little bit more</p> <p>15 about the engineering aspect of -- of the role,</p> <p>16 what it means to impact -- have an impact on the</p> <p>17 product road map.</p> <p>18 A. Examples of impact can range from</p> <p>19 conceiving of a design of a new product and</p> <p>20 ensuring that it's built. It can be spotting an</p> <p>21 opportunity to evolve something that we already</p> <p>22 have and make it better.</p> <p>23 And it -- I think it's critical to</p> <p>24 point out that the idea itself is only a little</p> <p>25 bit of the role, that the -- the full as, you</p>

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<p style="text-align: right;">Page 34</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 know, shown in and is discussed in -- in I think</p> <p>2 numerous performance reviews of Ulku, you know,</p> <p>3 the -- the critical part is making sure that the</p> <p>4 engineering changes are accepted and driven into</p> <p>5 our baseline product road map.</p> <p>6 So there's a component that's, you</p> <p>7 know, spotting something, but the much more</p> <p>8 important component is the landing of that idea in</p> <p>9 what we build.</p> <p>10 Q. And working directly with engineers</p> <p>11 on that, is that also part of the role?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. When did you start to build</p> <p>14 out the TSC ladder within OCTO?</p> <p>15 A. Within weeks of deciding that we</p> <p>16 wanted to do this and deciding that the TSC job</p> <p>17 family was the best -- was the closest fit to what</p> <p>18 we were trying to achieve.</p> <p>19 Q. Do you recall what year that was?</p> <p>20 A. Yes, it was 2016.</p> <p>21 Q. And what did you do -- well, first of</p> <p>22 all, what positions did you identify that you</p> <p>23 wanted to hire on the TSC ladder in OCTO?</p> <p>24 A. The original job description mirrored</p> <p>25</p>	<p style="text-align: right;">Page 36</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. I don't recall there being.</p> <p>2 Q. And the technical director position,</p> <p>3 do you recall what that was -- what level that</p> <p>4 role was scoped for?</p> <p>5 A. Between Level 8 and Level 9.</p> <p>6 Q. Now, at some point after you</p> <p>7 commenced the hiring of technical directors, was</p> <p>8 the job ladder updated to reflect the ladder as it</p> <p>9 existed in OCTO?</p> <p>10 A. Yes. It -- I think it was roughly a</p> <p>11 year to a year and a half into hiring for OCTO.</p> <p>12 Q. So sometime in 2018?</p> <p>13 A. As I recall, yes.</p> <p>14 Q. Okay. Do you have the Box open?</p> <p>15 A. No, it will take me a minute to open.</p> <p>16 Q. Sure. Do you want go ahead and open</p> <p>17 that?</p> <p>18 A. Sure.</p> <p>19 Okay, I have it open.</p> <p>20 Q. And you're going to be looking for</p> <p>21 Tab 72.</p> <p>22 A. I have no items in the folder.</p> <p>23 Q. Okay. Go ahead and try to refresh.</p> <p>24 A. Okay.</p> <p>25</p>
<p style="text-align: right;">Page 35</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 the description of the categories that I've</p> <p>2 described earlier, which is techni -- we wanted to</p> <p>3 hire what we called technical directors for the</p> <p>4 office of the CTO and that job description</p> <p>5 consisted of the three activity types described</p> <p>6 earlier; the customer influence and progress, the</p> <p>7 engineering influence and progress, and the</p> <p>8 evangelism.</p> <p>9 Q. Do you recall at the time what the</p> <p>10 top level was on the TSC job ladder that you had</p> <p>11 borrowed?</p> <p>12 A. The highest -- at the time, as I</p> <p>13 recall it, the highest codified level that we</p> <p>14 could hire for was a Level 9.</p> <p>15 Q. Do you recall whether the Level 9 had</p> <p>16 its own entry in the job ladder or whether the job</p> <p>17 ladder ended at 8 plus?</p> <p>18 A. Yeah, as I recall there was less</p> <p>19 definition. Once you reached L 8 there was a</p> <p>20 general categorization of leadership on the</p> <p>21 technical solutions consultant ladder, leadership</p> <p>22 meaning 8 plus.</p> <p>23 Q. So there was no separate entry for</p> <p>24 L 8 and L 9?</p> <p>25</p>	<p style="text-align: right;">Page 37</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 MR. GAGE: It just appeared for me.</p> <p>2 A. I see it now.</p> <p>3 Q. Okay. We are going to mark this as</p> <p>4 Exhibit 76 and this is the Bates number of</p> <p>5 GOOG-ROWE-00059224 through 229. When I refer to</p> <p>6 Bates numbers, I'm referring to those small</p> <p>7 numbers in the lower right-hand corner.</p> <p>8 (Whereupon, Exhibit 76 was marked at</p> <p>9 this time.)</p> <p>10 Q. Do you recognize this as an e-mail</p> <p>11 string on which some of the string you are a</p> <p>12 recipient?</p> <p>13 A. I'm reading through it now.</p> <p>14 Yes.</p> <p>15 Q. Okay. I would like you to look at</p> <p>16 the page that has the small Bates Number 226.</p> <p>17 MR. GAGE: Is that the third page of</p> <p>18 the PDF?</p> <p>19 MS. GREENE: It is.</p> <p>20 A. Okay, I see that, Page 3.</p> <p>21 Q. Okay, and do you see the entry from</p> <p>22 March 26, 2018 at 8:54 a.m.?</p> <p>23 A. I do.</p> <p>24 Q. And you -- if the writing is small,</p> <p>25</p>

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<p style="text-align: right;">Page 42</p> <p>1 - WILL GRANNIS -</p> <p>2 Q. -- June 1st, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So is this consistent with</p> <p>5 your general recollection about when the TSC</p> <p>6 ladder was updated or revised to reflect how it</p> <p>7 operated in OCTO?</p> <p>8 A. Generally the TSC ladders been</p> <p>9 constantly evolving as all ladders do at Google.</p> <p>10 All ladders are updated on a semi-frequent basis.</p> <p>11 Q. With respect to your prior testimony</p> <p>12 about when a revision of the ladder was made to</p> <p>13 bring it more in alignment with how it operated in</p> <p>14 OCTO, is this -- is this consistent with around</p> <p>15 that time frame you mentioned before?</p> <p>16 A. Yes, it -- there was a constant -- we</p> <p>17 were constantly evolving the TSC ladders as well</p> <p>18 as SWE PM broadly speaking within Google.</p> <p>19 Q. I would like you now to take a look</p> <p>20 at the Box and you're going to be looking for Tab</p> <p>21 175.</p> <p>22 A. Okay, I've got it.</p> <p>23 Q. Actually, you know what, you can put</p> <p>24 that one aside. We're not going to mark that one</p> <p>25 yet.</p>	<p style="text-align: right;">Page 44</p> <p>1 - WILL GRANNIS -</p> <p>2 take a five-minute just bathroom and water</p> <p>3 break and so let's come back at 12:40.</p> <p>4 MR. GAGE: All right.</p> <p>5 THE VIDEOGRAPHER: Going off the</p> <p>6 record at 12:34 p.m. Eastern.</p> <p>7 (Whereupon, there was a brief recess</p> <p>8 in the proceedings.)</p> <p>9 THE VIDEOGRAPHER: We are back on the</p> <p>10 record at 12:42 p.m. Eastern.</p> <p>11 Q. Okay. Mr. Grannis, can you look in</p> <p>12 the Box at Exhibit 61. This document was</p> <p>13 previously marked as Exhibit 61 and has the Bates</p> <p>14 number GOOG-ROWE-00055477 through 479.</p> <p>15 A. Okay, I see it.</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. Yes.</p> <p>18 Q. And what is this?</p> <p>19 A. This is a position description for</p> <p>20 the office of CTO technical director.</p> <p>21 Q. When -- and when you were referring</p> <p>22 to the job description earlier, is this what you</p> <p>23 were referring to?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. This is the external job description,</p>
<p style="text-align: right;">Page 43</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Okay.</p> <p>3 Q. At the time you were hiring into the</p> <p>4 technical director positions, what kinds of</p> <p>5 candidates were you targeting?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. There were two -- I mean, the -- the</p> <p>8 role description is, you know, a really good guide</p> <p>9 to what we were looking for which is people who</p> <p>10 had skills, knowledge, abilities, demonstrated</p> <p>11 acumen across -- you know, the ability to advance</p> <p>12 customers, the ability to influence engineering,</p> <p>13 and the ability to convey very complex ideas</p> <p>14 externally to instigate action. So we were</p> <p>15 looking for the absolute best candidates we could</p> <p>16 find that could do those three things.</p> <p>17 Q. And were you looking to find</p> <p>18 candidates with respect to the certain industries?</p> <p>19 A. That actually wasn't the intention in</p> <p>20 hiring. We really wanted people that could cover</p> <p>21 these three areas and the -- the resultant</p> <p>22 pipeline, being able to communicate complex ideas</p> <p>23 to different organizations yielded a pipeline that</p> <p>24 included both vertical and non-vertical expertise.</p> <p>25 MS. GREENE: Okay. I would like to</p>	<p style="text-align: right;">Page 45</p> <p>1 - WILL GRANNIS -</p> <p>2 yes.</p> <p>3 Q. And so the technical directors that</p> <p>4 you were looking to hire, this was the external</p> <p>5 job description that you -- that you used?</p> <p>6 A. Yes.</p> <p>7 Q. Okay, I would like you now to close</p> <p>8 that out and go to Tab 43. We're going to need</p> <p>9 just a moment to load that in.</p> <p>10 A. Okay.</p> <p>11 MR. GAGE: What tab did you say; what</p> <p>12 was the number you said?</p> <p>13 MS. GREENE: It's going to be 4-3.</p> <p>14 MR. GAGE: Oh, okay.</p> <p>15 Q. I apologize for the delay. Okay,</p> <p>16 should be in if you want to refresh and we're</p> <p>17 going to mark this as Exhibit 78 and it has the</p> <p>18 Bates number GOOG-ROWE-00017356 through 358.</p> <p>19 (Whereupon, Exhibit 78 was marked at</p> <p>20 this time.)</p> <p>21 Q. Do you recognize this document?</p> <p>22 A. Yes.</p> <p>23 Q. And you're copied on this</p> <p>24 correspondence, correct?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 46</p> <p>- WILL GRANNIS -</p> <p>Q. And it's from August 28th of 2017, correct?</p> <p>A. Yes.</p> <p>Q. And this is an e-mail that Melissa Lawrence had sent to some recipients. Are those recipients people who you recognize as being technical directors within OCTO?</p> <p>A. At the time they were, yes.</p> <p>Q. Okay, and this is with respect to preparing for PERF, and does PERF refer to the performance review process?</p> <p>A. Yes.</p> <p>Q. And you see in Melissa's e-mail, she says "There is very little documented for L 8 plus expectations at Google. For general levelling, this is the best guide available for generic engineering." Do you see that?</p> <p>A. Yes.</p> <p>Q. And do you know whether that was a reference to the Eng level guide, the general Eng level guide?</p> <p>A. I -- I don't recall.</p> <p>Q. Do you recall whether the general engineering levelling guide was something that you</p>	<p style="text-align: right;">Page 48</p> <p>- WILL GRANNIS -</p> <p>Q. Sure. The context in which you've reviewed that, is that in relationship to your role in OCTO?</p> <p>A. Yes.</p> <p>Q. Okay. Now, if we can go back to what we marked as Exhibit 78 and that was Tab 43, do you have that document open again?</p> <p>A. I have it.</p> <p>Q. Okay. So as of August 28, 2017 was there a levelling guide specific for the TSC ladder as it existed in OCTO?</p> <p>A. Not that I recall.</p> <p>Q. Okay. You can put that aside.</p> <p>Now, in connection with hiring the technical directors, were you -- were you provided with a levelling guide to assist you in that process?</p> <p>A. As a -- no.</p> <p>Q. Okay. I want you to look now at Tab 175 and we're going to mark this as Exhibit 79 and it has the Bates number GOOG-ROWE-00019205 through 208.</p> <p>(Whereupon, Exhibit 79 was marked at this time.)</p>
<p style="text-align: right;">Page 47</p> <p>- WILL GRANNIS -</p> <p>reviewed in connection with the performance review process?</p> <p>A. I don't recall.</p> <p>Q. Okay. Why don't you go ahead, we're going to look at another document. We're going to come back to this. If you can go back to the Box and look now at Tab 175.</p> <p>A. Okay, I've got it.</p> <p>Q. I'm sorry, I keep sending you to that document and it's not the right one. I actually wanted you to look at Exhibit 6.</p> <p>A. Okay.</p> <p>Q. This document was previously marked as Exhibit 6 and has the Bates number P001584 through 85. Do you recognize this document?</p> <p>A. It appears to be Engineering-Wide Levelling Guide for this year's performance review.</p> <p>Q. Have you seen Engineering-Wide Levelling Guides like this in the past?</p> <p>A. Yes.</p> <p>Q. And have you seen it in connection with the technical directors in OCTO?</p> <p>A. I don't understand your question.</p>	<p style="text-align: right;">Page 49</p> <p>- WILL GRANNIS -</p> <p>Q. Do you recognize this document?</p> <p>A. No.</p> <p>Q. Have you seen any document like this before, an "L 8 Assessment-Based Interview Questions"?</p> <p>MR. GAGE: Objection.</p> <p>A. Yes, I have seen rubric-based interview questions before.</p> <p>Q. For L 8 specifically, L 8 plus specifically?</p> <p>A. Yes.</p> <p>Q. Okay. Do you recall with respect to the hiring of the technical directors in 2016/early 2017 whether you were given any sort of assessment-based interview questions for the L 8 plus level?</p> <p>MR. GAGE: Objection.</p> <p>A. We -- yes, we utilized a -- a series of questions for all candidates, rubric-based questions.</p> <p>Q. And was it the same rubric-based questions for all candidates?</p> <p>A. Yes.</p> <p>Q. Okay, give me one moment.</p>



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50 to 53

<p style="text-align: right;">Page 50</p> <p>1 - WILL GRANNIS -</p> <p>2 Okay. So the technical directors</p> <p>3 that you were in the process of hiring in late</p> <p>4 2016/early 2017, you expected them to fit within</p> <p>5 that job description, correct?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. Are you referring to the job</p> <p>8 description earlier, the external job description?</p> <p>9 Q. Correct.</p> <p>10 A. Yes.</p> <p>11 Q. And they would all have -- were being</p> <p>12 hired for roles that would have the same types of</p> <p>13 job responsibilities, correct?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. Yes, the three pillars I referred to</p> <p>16 earlier; the customer advancement, the engineering</p> <p>17 advancement, and the evangelism.</p> <p>18 Q. Okay. So each of the candidates who</p> <p>19 were hired into this role needed to have similar</p> <p>20 skill sets to be able to meet those three pillars,</p> <p>21 correct?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Yes.</p> <p>24 Q. And what was that skill set that</p> <p>25 would be required?</p>	<p style="text-align: right;">Page 52</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Yes.</p> <p>3 Q. How do you define Googliness as that</p> <p>4 term is used at Google?</p> <p>5 A. I don't create a separate definition.</p> <p>6 I use the -- what we did for hiring technical</p> <p>7 directors is we look for, you know, proven</p> <p>8 methods to assess Googliness. In this case,</p> <p>9 that's -- you've highlighted here the</p> <p>10 standard-type questions which would be used when</p> <p>11 we interview.</p> <p>12 Q. Okay. I guess I'm asking something</p> <p>13 just a little bit different, which is: When you</p> <p>14 use the term, you know, their "Googliness" or are</p> <p>15 they Googlely as you've heard that used and we've</p> <p>16 had other people testify about this as well,</p> <p>17 what's your understanding of what that means,</p> <p>18 Googliness?</p> <p>19 A. Googliness can comprise a range of</p> <p>20 attributes and again in looking at the -- you</p> <p>21 know, referencing Tab 175 I think it's a good</p> <p>22 example of how it isn't defined by just one</p> <p>23 characteristic, but it can be multiple</p> <p>24 characteristics. So here it shows, you know,</p> <p>25 thriving in ambiguity, caring about a team,</p>
<p style="text-align: right;">Page 51</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Demonstrated ability to understand</p> <p>4 and advance customers usually in the form of the</p> <p>5 experience -- firsthand experiences with Cloud,</p> <p>6 Cloud migration, second engineering experience</p> <p>7 sufficient to demonstrate ability to influence</p> <p>8 engineering groups without authority, and then</p> <p>9 third demonstrated thought leadership or some form</p> <p>10 of evangelism.</p> <p>11 Q. And so as you were interviewing</p> <p>12 candidates, were you evaluating them against that</p> <p>13 skill set as to whether you should hire them?</p> <p>14 A. We were evaluating them against the</p> <p>15 standard rubric which includes four categories,</p> <p>16 three of which are represented on Tab 175 and the</p> <p>17 fourth which is role-related knowledge which is</p> <p>18 the three categories I've described.</p> <p>19 Q. You made a reference to Tab 175, so I</p> <p>20 just wanted to look at that --</p> <p>21 A. Yes.</p> <p>22 Q. -- if you have it open.</p> <p>23 A. Yeah, I -- I still have it open.</p> <p>24 Q. Perfect. So are you referring to the</p> <p>25 categories of leadership, Googliness, and GCA?</p>	<p style="text-align: right;">Page 53</p> <p>1 - WILL GRANNIS -</p> <p>2 challenge of status quo. There's multiple</p> <p>3 dimensions on which someone can demonstrate</p> <p>4 Googliness.</p> <p>5 Q. Are there other attributes that you</p> <p>6 would put under "Googliness," as you understand</p> <p>7 that term?</p> <p>8 A. I think humility is generally brought</p> <p>9 up.</p> <p>10 Q. Anything else?</p> <p>11 A. I think that's a pretty comprehensive</p> <p>12 list that's on the tab.</p> <p>13 Q. What -- other than the questions that</p> <p>14 you were provided, the rubric questions you were</p> <p>15 provided in the context of interviewing technical</p> <p>16 director candidates, do you -- were you provided</p> <p>17 with any other materials to assist you in that</p> <p>18 interview process?</p> <p>19 A. Yes.</p> <p>20 Q. What?</p> <p>21 A. Typically candidate's resume and any</p> <p>22 relevant background information that they had</p> <p>23 provided to help us prepare for the interview.</p> <p>24 Q. Anything else?</p> <p>25 A. Not that I recall.</p>



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54 to 57

<p style="text-align: right;">Page 54</p> <p>- WILL GRANNIS -</p> <p>Q. Do you recall whether you reviewed any Google policies or operations guides in connection with your interview of -- interviews of technical director candidates?</p> <p>A. Well, I and all Googlers are required to go through training in order to be interviewers.</p> <p>Q. And what did your training entail?</p> <p>A. A knowledge of the four categories I described earlier; how to take notes, how to utilize the system we call GHire which is the system of record for notes from interviews, and just general how to create time, space in a conversation to make sure there's adequate time for a candidate to answer questions and then also ask questions at the end.</p> <p>Q. Going back again to the 2016/20 -- early 2017 time frame, had you received training with respect to implicit bias?</p> <p>MR. GAGE: Objection.</p> <p>A. I don't recall the training that I had four or five, almost six years ago, no.</p> <p>Q. Have you since received any training on implicit bias?</p>	<p style="text-align: right;">Page 56</p> <p>- WILL GRANNIS -</p> <p>had experience in verticals and how they might fit into the -- the organization that you were building.</p> <p>MR. GAGE: Objection.</p> <p>A. The primary goal in hiring for OCTO was to hire people that could fulfill the three -- from a role-related knowledge standpoint, the core was the three pillars that I referred to earlier that comprised the job requirements in the role-related knowledge.</p> <p>Q. And so if someone had deep experience in a particular vertical, is that something that was attractive to you -- to you the same as the other qualifications?</p> <p>A. Yes.</p> <p>Q. Okay, and did you identify candidates who had that depth of experience in the vertical in the process of interviewing?</p> <p>A. Yes.</p> <p>Q. And so with respect to -- who would be in that category of people who had depth of experience in a particular industry vertical?</p> <p>MR. GAGE: Objection.</p> <p>Q. I'm looking for names.</p>
<p style="text-align: right;">Page 55</p> <p>- WILL GRANNIS -</p> <p>MR. GAGE: Objection.</p> <p>A. Yes.</p> <p>Q. Okay. Now, you mentioned the term "vertical" earlier. Can you define that term for me as -- as you mentioned in the context?</p> <p>A. Industries; banking, healthcare, retail, media, entertainment, gaming are examples not all-inclusive.</p> <p>Q. And so as you were going through the interview process, did you start to identify candidates with background or experience in particular verticals?</p> <p>A. Yes.</p> <p>Q. Okay, and what can you tell me about that?</p> <p>MR. GAGE: Objection.</p> <p>A. Is -- is there something more -- I don't understand the question. It -- it seems very broad.</p> <p>Q. Yeah, it is a broad question because I want to understand what your thought process was --</p> <p>A. Okay.</p> <p>Q. -- around the hiring of people who</p>	<p style="text-align: right;">Page 57</p> <p>- WILL GRANNIS -</p> <p>A. I've interviewed likely over a thousand people since I came to Google.</p> <p>Q. Well, so I'll help. Let's focus in on people you hired. Amongst the people, the candidates that you ended up hiring, which ones of those are ones that you would say, you know, these were people -- or people who have, you know, industry-depth experience --</p> <p>A. Are of them.</p> <p>Q. -- in a particular industry?</p> <p>A. All of them.</p> <p>Q. Okay. So all of the candidates in addition to fulfilling the four -- three groups that you mentioned earlier, also had additional experience in a particular industry?</p> <p>A. No, I -- please me to clarify. When I think of the industry experience, I think of it as their ability to fulfill part of Pillar 1 and part of Pillar 3. Pillar 1 being the ability to influence as subject matter experts a customer.</p> <p>So for example if we are trying to advance a customer in retail, someone who has a retail background will likely be able to speak the language of that customer more easily. So it</p>

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58 to 61

<p style="text-align: right;">Page 58</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 helps them to fulfill Bucket Number 1 or Pillar</p> <p>2 Number 1 of their job and if they're very familiar</p> <p>3 in the retail industry they may be very effective</p> <p>4 in retail industry forums or thought leadership</p> <p>5 seminars or panels or things like that, which</p> <p>6 would help them fulfill Bucket Number 3.</p> <p>7 It always comes back to the -- the</p> <p>8 ability within to execute the job across those</p> <p>9 pillars.</p> <p>10 Q. So in order to be able to execute the</p> <p>11 job for Pillar 1 and for Pillar 3, a candidate</p> <p>12 would need a depth of experience in the industry</p> <p>13 that they would be targeting in Pillars 1 and</p> <p>14 Pillars 3; is that a fair summary?</p> <p>15 A. Yes.</p> <p>16 Q. So with respect to the hiring</p> <p>17 process, at what point did you make a</p> <p>18 determination as to what level a particular</p> <p>19 candidate should join Google in?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. To clarify, I didn't make level</p> <p>22 determinations.</p> <p>23 Q. Did you make leveling --</p> <p>24 A. I --</p>	<p style="text-align: right;">Page 60</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 the interviews for all of the candidates?</p> <p>2 A. All of the interviews for a</p> <p>3 candidate.</p> <p>4 Q. Okay, and what steps did you take in</p> <p>5 connection with making a recommendation as to what</p> <p>6 level a candidate should come in at?</p> <p>7 A. The degree to which they demonstrated</p> <p>8 experience, background, acumen across the core</p> <p>9 elements of the role, the role-related knowledge</p> <p>10 as well as the -- the three other categories;</p> <p>11 Googliness, GCA, and leadership.</p> <p>12 Q. Did you consider anything beyond what</p> <p>13 you've just described?</p> <p>14 A. No.</p> <p>15 Q. And what did you do, if anything, to</p> <p>16 document your thought process with respect to</p> <p>17 that?</p> <p>18 A. We used a system called GHire and all</p> <p>19 of my notes and recommendations are in GHire.</p> <p>20 Q. Outside of GHire, did you do anything</p> <p>21 else to document your thought process?</p> <p>22 A. Not that I recall.</p> <p>23 Q. And once you made a recommend-- well,</p> <p>24 let me back up. To whom were you making a</p> <p>25</p>
<p style="text-align: right;">Page 59</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. I'll let you finish.</p> <p>2 A. I -- I was just saying I don't make</p> <p>3 level determinations, but as part of the process</p> <p>4 my job was to ensure that they were -- they were</p> <p>5 qualified at the L 8 plus level, that -- their</p> <p>6 demonstrated experience, you know, I gave a</p> <p>7 recommendation along those lines.</p> <p>8 Q. Okay. So --</p> <p>9 A. We -- we call it a statement of</p> <p>10 support.</p> <p>11 Q. So assuming someone met the L 8 plus</p> <p>12 qualifications, what was your role in deciding</p> <p>13 whether they were -- or determining whether they</p> <p>14 would come in as an L 8, an L 9, or something</p> <p>15 else?</p> <p>16 A. I didn't have a role in determining.</p> <p>17 Q. Did you make a recommendation?</p> <p>18 A. Yes.</p> <p>19 Q. And at what stage did you make a</p> <p>20 recommendation?</p> <p>21 A. Once all of the interviews were</p> <p>22 complete.</p> <p>23 Q. And by that, do you mean all of the</p> <p>24 interviews for a particular candidate or all of</p> <p>25</p>	<p style="text-align: right;">Page 61</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 recommendation?</p> <p>2 A. There are as I understand it two</p> <p>3 forms of review, hiring committee and then a final</p> <p>4 review; and so I was making a recommendation that</p> <p>5 would pair with recruiting's recommendation for</p> <p>6 those two sets of reviews.</p> <p>7 Q. And who made the final decision with</p> <p>8 respect to at what level a candidate would be</p> <p>9 hired?</p> <p>10 A. I don't know if -- I didn't always</p> <p>11 know. I didn't know. The review process is a</p> <p>12 closed process. I didn't know who was in that</p> <p>13 meeting.</p> <p>14 Q. Are you aware of any instances where</p> <p>15 you recommended someone to be hired as a Level 8</p> <p>16 and the ultimate determination was that they would</p> <p>17 be hired as a Level 9?</p> <p>18 A. I don't recall.</p> <p>19 Q. Are you aware of any instances where</p> <p>20 you recommended that someone be hired as a Level 9</p> <p>21 and instead they were hired as a Level 8?</p> <p>22 A. Sorry, I'm just thinking.</p> <p>23 Q. Of course.</p> <p>24 A. I -- I don't recall off the top of my</p> <p>25</p>

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62 to 65

<p style="text-align: right;">Page 62</p> <p>1 - WILL GRANNIS -</p> <p>2 head.</p> <p>3 Q. Are you -- do you recall any</p> <p>4 circumstances where you were requir -- or you</p> <p>5 were asked to provide additional document --</p> <p>6 documentation or information supporting your</p> <p>7 recommendation?</p> <p>8 A. No, I only recall the statement of</p> <p>9 support.</p> <p>10 Q. Now, at the time you were hiring</p> <p>11 these individuals into the role it was early on in</p> <p>12 building out the function, correct?</p> <p>13 A. Which individuals are you referring</p> <p>14 to?</p> <p>15 Q. The technical directors that you</p> <p>16 hired in late 2016/early 2017.</p> <p>17 A. Yes, that period of time was the</p> <p>18 beginning of the team, yup.</p> <p>19 Q. And at that time you didn't have a</p> <p>20 super strong sense of what distinguishes an 8 from</p> <p>21 a 9, correct?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. At what point in time are you</p> <p>24 referring to?</p> <p>25 Q. The late 2016/early2017 time frame.</p>	<p style="text-align: right;">Page 64</p> <p>1 - WILL GRANNIS -</p> <p>2 but I could be mistaken.</p> <p>3 Q. Well, my question is: Are you</p> <p>4 including him in this group of the first five to</p> <p>5 eight you hired; was he one of the first let's say</p> <p>6 eight, up to eight; was he one of the first eight</p> <p>7 you hired?</p> <p>8 MR. GAGE: Objection, asked and</p> <p>9 answered.</p> <p>10 Q. You can answer.</p> <p>11 A. I -- I don't know.</p> <p>12 Q. Okay.</p> <p>13 A. I -- I would have to see the actual</p> <p>14 dates of hire to be able to verify and I don't</p> <p>15 have that in front of me.</p> <p>16 Q. What about Ben Wilson; do you recall</p> <p>17 whether he was one of the first eight you hired?</p> <p>18 A. Again, we hired a lot of people in a</p> <p>19 short period of time. I'd really need to see a</p> <p>20 timing sequence.</p> <p>21 Q. Okay. At the time though that you</p> <p>22 were hiring in -- in late 2016/early2017, you</p> <p>23 didn't have a great super-calibrated reference</p> <p>24 frame with respect to levelling in that technical</p> <p>25 director position, correct?</p>
<p style="text-align: right;">Page 63</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Well, the time frame matters a lot</p> <p>3 because in the beginning -- you know, in 2016 when</p> <p>4 we first started the team, I would -- I would</p> <p>5 assess the first five to, you know, eight people</p> <p>6 that were in the team, we had a little bit less of</p> <p>7 a sense; and then as we hired more and more,</p> <p>8 that -- the pattern clearly emerged.</p> <p>9 Q. Who were the first five to eight</p> <p>10 people you're referring to?</p> <p>11 A. The first five -- roughly five, six</p> <p>12 that we hired in 2016, so within two months of</p> <p>13 starting the meeting I referred to earlier where</p> <p>14 we decided that we were going to try to -- we had</p> <p>15 a number of -- we had the beginning of external</p> <p>16 hires and we had internal transfers as well.</p> <p>17 Q. And so what are the names of those</p> <p>18 five to eight individuals, do you recall?</p> <p>19 A. Oh, I don't recall the names off the</p> <p>20 top of my head, but I -- I -- is there -- if</p> <p>21 there's a reference or something. I can validate?</p> <p>22 Q. Well, let me ask you -- I'll just</p> <p>23 give you some names and you tell me whether you're</p> <p>24 including them in this group. Nicholas Harteau?</p> <p>25 A. I don't think he was hired in 2016,</p>	<p style="text-align: right;">Page 65</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection, asked and</p> <p>3 answered.</p> <p>4 A. We -- we definitely learned over the</p> <p>5 period of that time and even over the period of</p> <p>6 the last four or five years, you know, we've -- we</p> <p>7 are always going to get better at how we're able</p> <p>8 to assess just based on volume.</p> <p>9 Q. At that time you didn't have any</p> <p>10 preconceived notions about levelling, correct?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. Well, we knew -- we knew it would be</p> <p>13 8 -- 8s and 9s primarily, just because of the</p> <p>14 requirements of the experience that's required to</p> <p>15 perform across those three pillars.</p> <p>16 Q. So what did you do to figure out</p> <p>17 whether someone would be coming in as a Level 8 or</p> <p>18 a Level 9?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. We interviewed them.</p> <p>21 Q. Anything beyond what you've already</p> <p>22 described?</p> <p>23 A. No.</p> <p>24 Q. So what was your basis for</p> <p>25 recommending Ms. Rowe as a level 8?</p>

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1 - WILL GRANNIS -

2 A. I'd have to see the interview packet.

3 Q. Okay. We're going to go back to the

4 Box.

5 A. Okay.

6 Q. I think I can get that up for you.

7 So we're going to be looking for Exhibit 59.

8 MR. GAGE: Is this already in the Box

9 or being placed there now?

10 MS. GREENE: It's in there.

11 MR. GAGE: 59?

12 MS. GREENE: Correct.

13 MR. GAGE: Let me refresh it. It

14 wasn't there.

15 A. Is this Exhibit 59?

16 Q. Correct.

17 A. Okay.

18 MS. GREENE: Ken, I think there must

19 be a lag on your end. I apologize for that.

20 We'll make sure to give you plenty of time.

21 MR. GAGE: I think it's intentional,

22 Cara. I think you're doing this on purpose.

23 I don't know how, but I'm going to figure it

24 out.

25 (Laughing.)

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1 - WILL GRANNIS -

2 All right, I have it now.

3 Q. Okay. We're looking at what's been

4 previously marked as Exhibit 59, Bates stamped

5 GOOG-ROWE-00019097 through 146.

6 So do you recognize this as Ms.

7 Rowe's GHire packet?

8 A. It appears to be, yes.

9 Q. Okay, and first I want to direct your

10 attention to the top of this document, the first

11 page.

12 It says "This candidate is an L 8

13 Principal Technical Solutions Consultant for the

14 Office of the CTO." Do you see that?

15 A. I do.

16 Q. And then underneath it mentions two

17 other people, Evren and Scott. Were those two

18 individuals who had -- that were being hired

19 around the same time?

20 MR. GAGE: Objection.

21 A. There's no date -- I'm looking for a

22 date on this artifact in order to determine how

23 close it is to the timing.

24 For example Evren was in late

25 October, Scott was in December. I don't -- and I

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1 - WILL GRANNIS -

2 don't -- I'm looking for the date of this packet.

3 Q. Sure. Well, I can say that if you

4 look at the end the NDA associated with it was

5 signed on November 14th of 2016, if that helps

6 place it in time.

7 A. Yeah, so it appears to be roughly the

8 same time.

9 Q. Okay. Now, I think the question

10 I had asked you was what was your basis for

11 recommending Ms. Rowe as a Level 8?

12 So if you want to flip through this

13 document and see if it refreshes your

14 recollection, and then that's the question I'll be

15 asking you.

16 A. Okay. Can I have a couple of minutes

17 to read?

18 Q. Yes, please take your time.

19 A. Okay.

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1 - WILL GRANNIS -

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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- WILL GRANNIS -

Do you know whether your own years of experience was something that Google considered in terms of your levelling?

MR. GAGE: Objection.

A. I do not know what anyone considered in my hiring process. They -- they didn't give me my results except to hire me.

Q. So you didn't have an understanding then that your years of experience was a factor that was considered in your level, correct?

MR. GAGE: Objection, asked and answered.

A. I -- I -- I don't know because I wasn't the one hiring me.

Q. Okay. Were you, in connection with the hiring of the candidates, provided with any sort of metrics that equated years of experience to a particular level?

A. No.

Q. Okay, give me just a second. I'm going to pull up a document I hadn't planned to use, but I think it will make it easier.

A. Okay.

Q. Okay. We're in the process of adding

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1 - WILL GRANNIS -

2 Exhibit 2, so give it a moment to load and then

3 you can refresh and pull that up.

4 A. Exhibit 2?

5 Q. Yes.

6 A. Okay, I can see it.

7 MS. GREENE: How about you, Ken?

8 MR. GAGE: Not yet.

9 Okay, I've got it.

10 Q. Okay. You're looking at a copy of

11 what's been previously marked as Exhibit 2 with

12 the title "Level 8 and Level 9 Employees in Eng PM

13 Ops" and it is a 27-page document.

14 So I will first direct your attention

15 to Page 3 of this document.

16 A. Okay. I'm there.

17 Q. And if you look at the entries for

18 120 to 124, do you recognize those names?

19 A. Yes.

20 Q. And are those individuals who were

21 hired as directors, technical directors into OCTO?

22 A. Yes.

23 Q. And these five individuals were hired

24 as Level 9, correct?

25 A. Yes.

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74 to 77

<p style="text-align: right;">Page 74</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And did you recommend that each of</p> <p>2 these individuals be hired as a Level 9?</p> <p>3 A. I'd have to see my recommendations.</p> <p>4 Q. Okay. Do you recall whether any of</p> <p>5 the individuals requested that they be hired as a</p> <p>6 Level 9?</p> <p>7 A. I don't recall that.</p> <p>8 Q. Do you recall having a conversation</p> <p>9 with Ms. Rowe about what level she would be</p> <p>10 joining as?</p> <p>11 A. No.</p> <p>12 Q. Do you recall her asking whether</p> <p>13 Level 8 was the right level for her?</p> <p>14 A. No. What I recall, her concerns were</p> <p>15 in other areas.</p> <p>16 Q. Do you recall conversations around</p> <p>17 whether or not she would be an L 8 or -- or</p> <p>18 higher?</p> <p>19 A. I don't -- I don't recall this.</p> <p>20 Q. Do you recall telling her that</p> <p>21 everyone was coming into the same role?</p> <p>22 A. I don't recall, but that is</p> <p>23 definitely true that everyone was being hired for</p> <p>24 the same role, technical directors solutions</p> <p>25</p>	<p style="text-align: right;">Page 76</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 believe another document. It's going to take a</p> <p>2 minute.</p> <p>3 A. Okay.</p> <p>4 MR. GAGE: Should I refresh now or</p> <p>5 should I wait?</p> <p>6 MS. GREENE: No, I'll tell you when</p> <p>7 to refresh.</p> <p>8 MR. GAGE: Okay.</p> <p>9 MS. GREENE: That's okay.</p> <p>10 Q. Well, you know what, we'll come back</p> <p>11 to that in a minute. I'll ask something else</p> <p>12 while we're waiting for that.</p> <p>13 At the time you were -- let me ask</p> <p>14 you this: How many times did you speak with Ms.</p> <p>15 Rowe in connection with the hiring process?</p> <p>16 A. I don't recall exactly how many</p> <p>17 times, but certainly at least a couple, at least a</p> <p>18 few.</p> <p>19 Q. And do you recall in any of those</p> <p>20 discussions discussing the potential</p> <p>21 verticalization of financial services?</p> <p>22 A. What do you mean by</p> <p>23 "verticalization"?</p> <p>24 Q. Is that a term that you've heard used</p> <p>25</p>
<p style="text-align: right;">Page 75</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 consultant.</p> <p>2 Q. Do you recall telling her whether</p> <p>3 everyone was coming in at the same level?</p> <p>4 A. I don't recall saying that, no,</p> <p>5 because it wasn't true during her hiring process.</p> <p>6 I think we had already hired or were hiring,</p> <p>7 looking at hiring Evren I believe at L 9.</p> <p>8 Q. Did you -- do you recall whether you</p> <p>9 told her that some were coming in as Level 8 and</p> <p>10 some were coming in as Level 9?</p> <p>11 A. I don't recall --</p> <p>12 MR. GAGE: Objection.</p> <p>13 Go ahead.</p> <p>14 A. I don't recall having a levelling</p> <p>15 conversation with Ulku during the hiring process.</p> <p>16 Q. Okay. So, I apologize, I'm still</p> <p>17 going to ask the questions and it's fine if you</p> <p>18 don't remember.</p> <p>19 A. Okay.</p> <p>20 Q. Do you recall telling her that anyone</p> <p>21 was being hired as a Level 9?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No.</p> <p>24 Q. Okay. We're going to add in I</p> <p>25</p>	<p style="text-align: right;">Page 77</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 at Google?</p> <p>2 A. I mean. Some -- some derivatives,</p> <p>3 you know, like creating vertical businesses or</p> <p>4 creating, you know, vertical structures, go-to</p> <p>5 market, things like that, I've heard it. I've</p> <p>6 heard similar things used in that context.</p> <p>7 Q. Did you discuss with Ms. Rowe the</p> <p>8 concept of the financial services vertical at some</p> <p>9 point in the future?</p> <p>10 A. I'm just thinking back. One of the</p> <p>11 areas she was interested in was potential Google</p> <p>12 commitment towards financial services and industry</p> <p>13 based on her strong background in that industry.</p> <p>14 Q. Do you recall discussing whether at</p> <p>15 some point in the future Google might stand up a</p> <p>16 vertical for financial services?</p> <p>17 A. That was certainly a topic that she</p> <p>18 and I discussed. When we discussed it, I don't</p> <p>19 recall the exact timing of it.</p> <p>20 Q. Do you recall telling her that when</p> <p>21 Google did stand up verticals, you believed she</p> <p>22 had a lot of qualifications to compete for the</p> <p>23 head of that vertical?</p> <p>24 A. The -- the nature of that comment</p> <p>25</p>

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1 Q. Now, did there come a point in time

2 when you considered having Ms. Rowe oversee the

3 other technical directors with -- with vertical

4 specialty in OCTO?

5 MR. GAGE: Objection.

6 A. Sorry, I'm just thinking back. Well,

7 as part of professional development for all of our

8 OCTOs, I am always thinking about their potential

9 to be managers.

10 Q. Okay. We're going to look at Tab 42.

11 MR. GAGE: Is this newly added?

12 MS. GREENE: Yes. We'll give it a

13 minute.

14 MR. GAGE: Does that mean it's been

15 placed there or is going to be placed there?

16 MS. GREENE: It's in the -- it's in

17 the process of being placed.

18 MR. GAGE: Okay.

19 A. Tab 42?

20 Q. It should be in there now, yes.

21 A. Okay, I got it.

22 Q. Okay. We're going to mark this as

23 Exhibit 80 and it has the Bates number

24 GOOG-ROWE-00058796 through 99.

25

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- WILL GRANNIS -

1 (Whereupon, Exhibit 80 was marked at

2 this time.)

3 Q. Just take a minute and read through

4 this.

5 A. Uh-huh.

6 Okay.

7 Q. Do you recall in the August,

8 20 -- 2017 time frame conversations about

9 reorganizing OCTO?

10 A. I do recall a conversation around

11 span sometime around that time where I described

12 the -- the situation where we had I think -- I

13 don't recall how many people we had, but a

14 significant amount of span direct reports and we

15 were looking at smart -- we were trying to think

16 about smart ways to organize the team.

17 Q. Okay, because you had too many direct

18 reports in part?

19 A. Because we had too -- yeah, because

20 we had too many direct reports and I had too many

21 direct reports and we were looking at ways to make

22 sure that we were covering these topics and that

23 we were set up in a sustainable way because we

24 were about to see a large amount of growth in the

25

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1 team.

2 Q. Okay. So then if you look at the

3 chart, does this outline groups that were being

4 discussed?

5 A. Yes, that -- that looks like one of

6 the options that we had drawn up.

7 Q. And one of the -- of the options

8 was -- had verticals as a group, correct?

9 A. Yes.

10 Q. And what -- what was verticals; what

11 was that referring to?

12 A. Industries.

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25 Q. And so would this proposal,

Page 93

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1 that -- that I think it's Melissa Lawrence is

2 sharing, have Ms. Rowe as the leader of that

3 vertical group?

4 A. Yes.

5 Q. Okay, and if you could go back up to

6 the first group now -- the first page, I'm sorry,

7 and look at the fourth paragraph where it starts

8 with "We would like to."

9 A. Okay.

10 Q. And the last sentence there is,

11 "There is one level inversion in the verticals

12 group with Ulku Rowe leading the group at a L 8

13 and Ben Wilson at a L 9, but we all feel that she

14 is the best person for the role." Do you see

15 that?

16 A. I do.

17 Q. And, first of all, what do you

18 understand the term "inversion" to refer to?

19 A. Inversion is a term we use when a

20 manager is at a lower level than their direct

21 reports.

22 Q. Okay. Was this a true statement,

23 that "we all feel that she is the best person for

24 the role"?

25



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114 to 117

<p style="text-align: right;">Page 114</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And we're going to mark this as</p> <p>2 Exhibit 87, Bates stamped GOOG-ROWE-00060436</p> <p>3 through 437.</p> <p>4 (Whereupon, Exhibit 87 was marked for</p> <p>5 identification.)</p> <p>6 Q. And if you can look at the bottom</p> <p>7 portion of that first page --</p> <p>8 A. Okay.</p> <p>9 Q. -- does this reflect a ladder</p> <p>10 transf -- a section around a ladder transfer for</p> <p>11 Nick Harteau from the director -- the technical</p> <p>12 director role to an SWE manager ladder?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Oh, I didn't write this e-mail and I</p> <p>15 wasn't on copy, so I don't know exactly what it's</p> <p>16 in reference -- what it refers to --</p> <p>17 Q. Well --</p> <p>18 A. -- but it seems the words are</p> <p>19 describing transfer action.</p> <p>20 Q. Okay, and is this the transfer action</p> <p>21 that you were aware of with respect to Mr.</p> <p>22 Harteau?</p> <p>23 A. Yes, this appears to be the same</p> <p>24 transfer.</p> <p>25</p>	<p style="text-align: right;">Page 116</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 engineering ladder, customer and evangelism aren't</p> <p>2 present in the pillar requirements.</p> <p>3 So the skills that are transferable</p> <p>4 are engineering, but that ladder doesn't recognize</p> <p>5 the skills of large-customer advancement and</p> <p>6 evangelism as val -- as core valuable pieces of</p> <p>7 their job description.</p> <p>8 Q. Are there aspects of the skills that</p> <p>9 someone would have with respect to Pillars 1 and 3</p> <p>10 in TSC that would be skills that could also be</p> <p>11 used with respect to a manager in SWE?</p> <p>12 A. The three OCTO pillars, the first and</p> <p>13 third pillars would be largely negligible to</p> <p>14 transfer to a SWE manager.</p> <p>15 Q. Understood. The pillars describe the</p> <p>16 responsibilities of the TSC, is that a fair way to</p> <p>17 characterize that?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Responsibilities, skills, background,</p> <p>20 experience necessary, yes.</p> <p>21 Q. Okay. So, for instance, thought</p> <p>22 leadership might be a skill that's relevant to the</p> <p>23 first and third pillars, correct?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p>
<p style="text-align: right;">Page 115</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. What was the context of that</p> <p>2 transfer; why was he being transferred?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. He wanted to lead a production</p> <p>5 engineering team, something we don't do in OCTO.</p> <p>6 Q. So he was being transferred from the</p> <p>7 technical director Eng role into an SWE Eng role?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. I'm -- I'm just reading this again</p> <p>10 just cause I -- I've never seen this before.</p> <p>11 Yes, TSE to SWE manager.</p> <p>12 Q. And did you support this transfer?</p> <p>13 A. Yes.</p> <p>14 Q. And did you view his skills in TSC as</p> <p>15 transferrable to SWE?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. Some of them.</p> <p>18 Q. And what skills are transferable?</p> <p>19 A. It's more about the -- it's more</p> <p>20 about the job family, and let me explain. The job</p> <p>21 family -- technical solutions consultant, we</p> <p>22 described earlier the three pillars of this role.</p> <p>23 The pillars are customer, evangelism, and</p> <p>24 engineering. In the SWE ladder, software</p> <p>25</p>	<p style="text-align: right;">Page 117</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. Mostly -- mostly the third, but</p> <p>2 ome -- somewhat in the first, yes.</p> <p>3 Q. Okay. Do you see thought</p> <p>4 leadership and evangelism as interchangeable or as</p> <p>5 different -- different things?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. They are slightly different skills.</p> <p>8 Thought leadership is the ability to take a</p> <p>9 situation, use experience, knowledge, what you</p> <p>10 learn and be able to advance a -- a situation or</p> <p>11 an area that quite often others don't believe or</p> <p>12 don't agree with. Evangelism is purely the act of</p> <p>13 communicating externally on behalf of something.</p> <p>14 Q. Okay. We looked earlier at that</p> <p>15 engineering levelling guide --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- do you recall that?</p> <p>18 A. I do.</p> <p>19 Q. With -- with respect to the items</p> <p>20 that were contained on the engineering levelling</p> <p>21 guide, and if you need to we can go back to that</p> <p>22 document, but is it your understanding that those</p> <p>23 items are items that apply both to TSCs and to</p> <p>24 SWEs?</p> <p>25</p>

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118 to 121

<p style="text-align: right;">Page 118</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Somewhat, but that's also why we have</p> <p>4 job families that are more descriptive in terms of</p> <p>5 requirements.</p> <p>6 Q. I want to make sure I'm directing</p> <p>7 you, give me one moment. Okay, let's go back and</p> <p>8 look at that. It's Exhibit 6.</p> <p>9 A. Okay.</p> <p>10 MR. GAGE: Is this already there</p> <p>11 or --</p> <p>12 MS. GREENE: It's there.</p> <p>13 MR. GAGE: Exhibit 6, Adam Lief, this</p> <p>14 one?</p> <p>15 MS. GREENE: Yes.</p> <p>16 A. I have it up.</p> <p>17 Q. Okay. If we can look at the</p> <p>18 last -- Page 2, the entries for Level 8 and Level</p> <p>19 9, are there any entries there that you would say</p> <p>20 do not apply to technical directors?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. And was the question are there any</p> <p>23 that don't explicitly apply?</p> <p>24 Q. That you would say well, this isn't</p> <p>25 relevant with respect to the TSC ladder or roles.</p>	<p style="text-align: right;">Page 120</p> <p>1 - WILL GRANNIS -</p> <p>2 9 in SWE?</p> <p>3 MR. GAGE: Objection. Someone in</p> <p>4 particular?</p> <p>5 MS. GREENE: No, I asked about the</p> <p>6 role.</p> <p>7 MR. GAGE: Oh, you used the word</p> <p>8 "someone," that's why I -- I asked the</p> <p>9 question.</p> <p>10 Q. The attributes of someone in that</p> <p>11 role.</p> <p>12 A. In the SWE manager role?</p> <p>13 Q. Correct, at a Level 8 or 9.</p> <p>14 A. I think generally speaking, you know,</p> <p>15 we would expect to see things like this at those</p> <p>16 levels.</p> <p>17 Q. Okay. You can put that aside.</p> <p>18 A. Okay.</p> <p>19 Q. Do you know who Ben Wilson is?</p> <p>20 A. I do.</p> <p>21 Q. And he's also -- his full name is I</p> <p>22 think Benjamin Wilson; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay, and he -- is he someone also</p> <p>25 whom you hired into the technical director in</p>
<p style="text-align: right;">Page 119</p> <p>1 - WILL GRANNIS -</p> <p>2 A. None that immediately jump out as</p> <p>3 defined.</p> <p>4 Q. Okay, and with respect to a SWE, are</p> <p>5 there any here that you would say as far as you</p> <p>6 understand the role of SWE do not apply to SWE?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. In the category of leadership, I</p> <p>9 think that these would -- these would apply.</p> <p>10 Q. Okay. Well, just so I'm clear: If we</p> <p>11 go all the way back up to Page 1, there's four</p> <p>12 levelling criteria; knowledge and experience,</p> <p>13 complexity and scope, leadership and influence,</p> <p>14 and organizational impact. Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. Okay. So with respect to Levels 8</p> <p>17 and 9, do each of those categories in this</p> <p>18 document apply to SWE?</p> <p>19 A. Well, it says just up in the header</p> <p>20 "It's not a representation of expectations for any</p> <p>21 specific ladder," so I think the answer is no.</p> <p>22 Q. So I'm asking you based on what you</p> <p>23 know about the SWE role and as you've observed it</p> <p>24 in operation, do these generally describe</p> <p>25 attributes of someone at the Level 8 and/or Level</p>	<p style="text-align: right;">Page 121</p> <p>1 - WILL GRANNIS -</p> <p>2 OCTO?</p> <p>3 A. Yes.</p> <p>4 Q. Do you know who Jonathan Donaldson</p> <p>5 is?</p> <p>6 A. Yes.</p> <p>7 Q. Is he another person who you hired</p> <p>8 into the technical director position in OCTO, that</p> <p>9 position we saw in the job description we looked</p> <p>10 at earlier?</p> <p>11 A. Yes.</p> <p>12 Q. What about Paul Strong, do you know</p> <p>13 who he is?</p> <p>14 A. Yes.</p> <p>15 Q. Is he someone else you hired as a</p> <p>16 technical director within OCTO?</p> <p>17 A. Yes.</p> <p>18 Q. And I -- I still have not figured out</p> <p>19 how to say his name, Evren Eryurek?</p> <p>20 A. Eryurek.</p> <p>21 Q. Yes. Is he another person that you</p> <p>22 hired in as a technical director within OCTO?</p> <p>23 A. Yes.</p> <p>24 Q. Now, at some point did Evren transfer</p> <p>25 to a PM ladder?</p>

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122 to 125

<p style="text-align: right;">Page 122</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. When he left OCTO he went into a</p> <p>2 probationary product management role, that's</p> <p>3 correct.</p> <p>4 Q. PM stands for Product Management?</p> <p>5 A. Yes.</p> <p>6 Q. So he had skills that were</p> <p>7 transferable from TSC to PM?</p> <p>8 A. That's why he was put in a</p> <p>9 probationary period, was to determine whether that</p> <p>10 was true or not.</p> <p>11 Q. And do you know the outcome of that?</p> <p>12 A. He's a product manager today, so...</p> <p>13 Q. Okay, and with respect to the</p> <p>14 engineering levelling guide that we looked at a</p> <p>15 bit ago with respect to Levels 8 and 9 in those</p> <p>16 four different categories for the PM manager role</p> <p>17 as you observed it at Google, do these descriptors</p> <p>18 apply to that ladder?</p> <p>19 A. Generally, yes, but again as states</p> <p>20 in the doc it doesn't represent the specific</p> <p>21 expectations for any job role including PM, SWE,</p> <p>22 or TSC.</p> <p>23 Q. Right. This is an Engineering-Wide</p> <p>24 Levelling Guide?</p> <p>25</p>	<p style="text-align: right;">Page 124</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Okay. If you want to look at Tab</p> <p>2 73 -- oh, actually, don't look at it yet. I</p> <p>3 apologize.</p> <p>4 MS. GREENE: Ken, if you want to look</p> <p>5 at Tab 73.</p> <p>6 MR. GAGE: You just have to speed up</p> <p>7 the transmission to me, Cara, they're still</p> <p>8 slow in coming to me. I don't know why. And</p> <p>9 my son is not home from school yet, so I know</p> <p>10 it's not the video games he plays that are</p> <p>11 eating up the bandwidth.</p> <p>12 Okay 73, you said?</p> <p>13 MS. GREENE: Yes.</p> <p>14 MR. GAGE: Go ahead.</p> <p>15 Q. Okay. If you can take a look at</p> <p>16 this document, we're going to Bates stamp this as</p> <p>17 Exhibit 88 -- Bates -- I'm sorry, we're going to</p> <p>18 mark it as Exhibit 88, Bates stamp</p> <p>19 GOOG-ROWE-00059393 through 442.</p> <p>20 (Whereupon, Exhibit 88 was marked for</p> <p>21 identification.)</p> <p>22 Q. So if you look in the upper</p> <p>23 right-hand corner of this first page and read that</p> <p>24 and tell me if it ref -- refreshes your</p> <p>25</p>
<p style="text-align: right;">Page 123</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. Yeah, this is -- yeah, there's an</p> <p>2 engineering category of jobs and then the job</p> <p>3 families, so this is for an engineering category</p> <p>4 of jobs.</p> <p>5 Q. So this is the -- the broader set and</p> <p>6 then an individual ladder may have its own levels</p> <p>7 defined as well, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And so earlier we looked at this when</p> <p>10 we discussed the TSC ladder itself was well,</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. All right. Do you know a woman or</p> <p>14 aware of a woman named Katia Walsh?</p> <p>15 A. Yes.</p> <p>16 Q. And how are you aware of her?</p> <p>17 A. She was being considered for a role</p> <p>18 in OCTO.</p> <p>19 Q. And was she offered a role?</p> <p>20 A. She was.</p> <p>21 Q. And do you recall at what level she</p> <p>22 was offered a role?</p> <p>23 A. I think it was L 9, but I'm not a</p> <p>24 hundred percent sure.</p> <p>25</p>	<p style="text-align: right;">Page 125</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 recollection about what level she was being</p> <p>2 proposed for.</p> <p>3 A. Yes.</p> <p>4 Q. Okay, and how does it refresh your</p> <p>5 recollection; what do you recall?</p> <p>6 A. Oh, okay. L 9.</p> <p>7 Q. Okay, and do you recall whether you</p> <p>8 made a recommendation with respect to her level?</p> <p>9 A. I did. I submitted a statement of</p> <p>10 support as I do for all candidates we hire.</p> <p>11 Q. Okay, and looking at Ms. Walsh and</p> <p>12 her education, do you know whether a Master of</p> <p>13 Arts and/or a Bachelor of Arts are positions</p> <p>14 that -- are degrees that Google would consider</p> <p>15 relevant to the position for which you were</p> <p>16 hiring?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I can't put myself in the position of</p> <p>19 determining what Google would assess or not</p> <p>20 assess. I can tell you as a hiring manager we</p> <p>21 look at a range of characteristics in the person's</p> <p>22 background, including practical experience and</p> <p>23 education.</p> <p>24 Q. Do you -- have you seen any Google</p> <p>25</p>

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Q. Okay. We're going to mark this as Exhibit 89 and you can go ahead and open it now, Tab 78 and we're going mark this as GOOG-ROWE-00059503 through 508.

(Whereupon, Exhibit 89 was marked at this time.)

Q. Okay. I would like you to turn first to the third page of this document, the one with the chart on it.

A. Yes.

Q. Do you recall receiving this chart?

A. I -- I mean, I don't remember every chart I've been sent, but it looks like it was sent to me from Katia. It appears --

MR. GAGE: Objection.

A. It appears from the e-mail it's been appended into a note she sent to me.

[REDACTED]

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- WILL GRANNIS -

as Exhibit 90, Bates stamped GOOG-ROWE-00056473 through 76.

(Whereupon, Exhibit 90 was marked for identification.)

Q. If you can, first look at the second page of this document.

A. Second page?

Q. Yes.

A. Okay.

Q. And I would like you to look at the bottom half of your e-mail from May 29, 2018.

A. Okay.

Q. Do you see where you say "PLs; DR."

A. Yes.

Q. What is that?

A. It's an abbreviation in computer science. We use it to say too long, didn't read. It's like a summary statement.

Q. And what was too long that you didn't read?

A. Yeah, in -- in case people don't want to read the entire thing. That's kind of the summary of it.

Q. Got it. And your summary, is that it

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Q. Okay. If you go to page -- the first page of this document. You write, "I agree. I also know that every woman who came to Google/OCTO, Jen, Ulku, have told me they feel like they didn't fight hard enough for themselves," signed one. At the time you made that statement, was that a true statement?

A. Yes.

Q. Okay, and then with respect to the next paragraph you write, "This is also the Number 1 area where women ask for my advice/mentoring respectfully fighting for what they think is fair comp." Was that also a true statement at the time you made it?

A. Yes.

Q. You can put that aside and I next would like you to look at Tab 79.

MS. GREENE: Does everyone have that up?

MR. GAGE: Not yet.

A. I've got it.

MR. GAGE: Go ahead.

Q. All right. We're going to mark this

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was what?

A. Not intervening.

Q. Rachel Quirk writes at 10:20 a.m., "I agree with Will completely. Katia's last response to escalate to Diane Greene and Brian Seaman is not Googley." Do you see that?

A. Yes.

Q. Do you agree that that was not Googley of her?

A. Yeah, -- I don't know that I -- I don't know that I'd frame it as Googley or not because we have a pretty strict rubric for Googley or a pretty defined rubric that we went over earlier, but I think it exercised poor judgment.

Q. Okay. If you can, go back to the first page now.

A. Okay.

Q. Rachel Quirk at the bottom shares Diane's response. Do you see that?

A. Yes.

Q. And is that referring to Diane Greene?

A. I didn't write the e-mail. I can't